

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA	:	
	:	
VS.	:	CRIMINAL NO. 1:08-CR-1248
	:	
	:	
CARLOS MARTINEZ-TELLO	:	

**MOTION TO REVEAL ANY DEALS and/or COMPENSATION
BETWEEN GOVERNMENT AND WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes, **CARLOS MARTINEZ-TELLO** , Defendant is the above styled and numbered cause, by and through his Attorney, Anthony P. Troiani and hereby makes and files this his Motion to Reveal any Deals and/or Compensation made between the Government and any Witnesses and by way of this Motion Defendant would show unto this Court:

1. This information is necessary for the proper defense of the case, it is relevant information of which the jury should be aware and without said information Defendant would be denied his rights under the Constitution of the United States.
2. The information requested is necessary for cross-examination of the witnesses and impeachment of them.

WHEREFORE PREMISED CONSIDERED, Defendant would pray that said Motion to Reveal any Deals and/or Compensation between the Government and Witnesses be in

all things granted.

Respectfully submitted,

/s/ Anthony P. Troiani
Anthony P. Troiani
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CERTIFICATE OF SERVICE

I, Anthony P. Troiani, hereby certify that on the 18th day of September, 2009, a true and correct copy of the foregoing motion was served on the following:

VIA Electronic Filing

Mr. Oscar Ponce
U.S. Attorney's Office
600 E. Harrison, Suite 201
Brownsville, Texas 78520

/s/ Anthony P. Troiani
Anthony P. Troiani